

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSSETTS**

AMERICAN ASSOCIATIONS OF
UNIVERSITY PROFESSORS, *et al.*,

Plaintiffs,

v.

MARCO RUBIO, in his official capacity as
Secretary of State, and the DEPARTMENT OF
STATE *et al.*,

Defendants.

No. 1:25-cv-10685-WGY

**DECLARATION OF ETHAN KANTER IN
SUPPORT OF DEFENDANTS'
RESPONSE TO PLAINTIFFS' MOTION
TO COMPEL**

I, Ethan Kanter, hereby declare:

1. I am one of the attorneys representing Defendants in the above-captioned matter, *AAUP v. Rubio*, No. 1:25-cv-10685-WGY. I have personal knowledge of the facts stated below and am competent to testify regarding the same.
2. On May 13, 2025, Plaintiffs served their initial discovery requests on Defendants; *see* **Exhibit A** (Plaintiffs' Requests for Production); **Exhibit B** (Plaintiffs' Interrogatories);
3. On May 19, 2025, Plaintiffs served their amended discovery requests on Defendants; *see* **Exhibit C** (Plaintiffs' Amended Requests for Production); **Exhibit D** (Plaintiffs' Amended Interrogatories);
4. On June 13, 2025, Defendants served on Plaintiffs' their responses and objections to Plaintiffs amended Requests for Production, along with Defendants' first production volume of responsive documents; *see* **Wilkins Decl. Ex. 2** (submitted under seal) (Government's Responses and Objections to RFPs); **Exhibit E** (June 13, 2025, Transmittal Email);

5. On June 21, 2025, Defendants served on Plaintiffs their responses and objections to Plaintiffs' amended interrogatories; *see* **Wilkens Decl. Ex. 10** (submitted under seal) (Governments Responses and Objections to Interrogatories); **Exhibit F** (Interrogatory Response Transmittal Email);
6. On June 11, 2025, Plaintiffs conducted the deposition of Andre Watson, Assistant Director, National Security Division, Homeland Security Investigations;
7. On June 12, 2025, Plaintiffs conducted the deposition of John Armstrong, Senior Bureau Official, Bureau of Consular Affairs, U.S. Department of State; **Sealed Exhibit G** (Armstrong Deposition Transcript).
8. On June 24, 2025, Plaintiffs conducted the deposition of Stuart Wilson, Deputy Assistant Secretary for Visa Services, Bureau of Consular Affairs, U.S. Department of State;
9. On June 25, 2025, Plaintiffs conducted the deposition of Peter Hatch, Assistant Director, Office of Intelligence, Homeland Security Investigations, Department of Homeland Security;
10. On June 30, 2025, Plaintiffs are scheduled to depose Andrew Veprek, Senior Advisor, Office of the Counselor, U.S. Department of State;
11. On July 1 and July 3, 2025, Plaintiffs are scheduled to depose Jessica Norris, Managing Director for Visa Services, Bureau of Consular Affairs, U.S. Department of State;
12. Defendants have also identified various DHS, Immigration and Customs Enforcement agents for Plaintiffs and will make them available for depositions to the extent that schedules allow.

I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED this 27th day of June 2025 in Washington, DC.

/s/ *Ethan Kanter*
Ethan Kanter